



HALIFAX

COMMUNITY HEALTH SYSTEM

September 7, 2005

Office of the Secretary
ATT: OCBO
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Request for comment regarding possible revision or elimination of rules under the Regulatory Flexibility Act DA-05-1524

My name is Glen Stockhammer, and I am the Credit & Collection Manager for Halifax Community Health System located in Daytona Beach, FL. I manage all the collections as well the outsourcing of all of the health systems accounts to our collection agencies. I can assure you that this Federal Regulatory decision will have a significant negative financial impact on the entire healthcare market. With more and more individuals having only cellular phones as their main communication means (no land lines in their homes) with myself being one of those individuals; this legislation will cripple the collections process and market and cause only greater increases in the cost of healthcare. Over the past couple years the cost of providing healthcare has grown so exponentially due to large volume increases in the charity and self pay (un-insured) revenues that many hospitals are already working on very small profit and operating margins and this legislation will only continue to negatively impact the healthcare market.

Halifax Community Health System is adamantly against this regulation as all of my collection vendors as well as our organization has the information systems technology and capabilities to utilize predictive dialers to call any telephone number including wireless numbers when attempting to recover debts for services rendered to our patients. Again, many of our patients utilize cellular technology as their only means of communication and knowingly provide these numbers to us whether it be to collect a debt or contact a patient for health related issues. I do not see how the collection industry will be able to function without the use of this technology and equipment. This regulation would devastate many businesses both inside and out of the collections industry causing businesses billions of dollars in lost revenue as of the result of unnecessary Consumer Protection for all the wrong reasons.

I am aware that ACA International ("ACA") has filed a written comment with the Commission regarding this issue in response to the Commission's request for comments on the possible revision or elimination of rules under the Regulatory Flexibility Act, 5 U.S.C. § 610 ("RFA"), in proceeding DA-05-1524. See FCC Seeks Comment Regarding Possible Revision or Elimination of Rules Under the Regulatory Flexibility Act, DA-05-1524 (May 31, 2005). I fully support ACA's comment and the relief the Association seeks, including ACA's characterization of the harm visited upon all businesses as a result of the Commission's rule.

To the extent that our company and business partners use predictive dialers, we/they do so to complete transactions for which consumers/patients have obtained a benefit/service without payment. We, nor do our business partners telemarket which should be the real cause for the legislation. The Commission should not permit its regulations to be used as a shield to encourage the non-payment of debts. Doing so harms all businesses, the economy, as well as consumers. As it stands today, our organization as well as our business partners, (collection vendors) face serious financial hardship due to the Commission's regulatory reversal that creditors and debt collectors cannot use predictive dialers to call a wireless number to attempt to recover outstanding payment obligations/debt. The Commission's rule requires small companies, at great cost, to fundamentally alter their business practices/models to reduce or remove their reliance on predictive dialers. This regulation also needlessly subjects many businesses in the collection industry to federal enforcement and private litigation risk, even though Congress never intended such an outcome.

For these reasons, I encourage the Commission to promptly clarify that autodialer calls to wireless numbers to attempt to recover payment obligations are not covered by the TCPA regulations for the reasons expressed by ACA.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Glen Stockhammer', with a long horizontal flourish extending to the right.

Glen Stockhammer
Credit & Collection Manager
Patient Business & Financial Services
Halifax Community Health System
386-226-4597